

1R - 425-98

**APPROVALS**

**YEAR(S):**

2012

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**Hansen, Edward J., EMNRD**

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**From:** Hansen, Edward J., EMNRD  
**Sent:** Wednesday, August 01, 2012 4:42 PM  
**To:** Hack Conder (hconder@riceswd.com)  
**Cc:** Leking, Geoffrey R, EMNRD; Laura Pena (lpena@riceswd.com)  
**Subject:** Remediation Plan (1R425-98) Termination - ROC Vacuum K-26 EOL Site

**RE: Termination Request  
for the Rice Operating Company's  
Vacuum K-26 EOL Site  
Unit Letter E, Section 26, T17S, R35E, NMPM, Lea County, New Mexico  
Remediation Plan (1R425-98) Termination**

Dear Mr. Conder:

The New Mexico Oil Conservation Division (OCD) has received Rice Operating Company's report and request to close the above-referenced site, dated July 2, 2012 (received July 3, 2012). The report is acceptable to the OCD.

The above-referenced report, submitted in accordance with 19.15.29 NMAC (Rule 29; formally, Rule 116), indicates that Rice Operating Company has met the requirements of 19.15.29 NMAC; therefore, the OCD approves the report and hereby notifies you that the remediation plan (1R425-98) is terminated in accordance with 19.15.29 NMAC.

Please be advised that OCD approval of this report does not relieve the owner/operator of responsibility should operations pose a threat to ground water, surface water, human health or the environment. In addition, OCD approval does not relieve the owner/operator of responsibility for compliance with any OCD, federal, state, or local laws and/or regulations.

If you have any questions regarding this matter, please contact me at 505-476-3489.

Edward J. Hansen  
Hydrologist  
Environmental Bureau

# RICE *Operating Company*

122 West Taylor • Hobbs, New Mexico 88240

Phone: (575) 393-9174 • Fax: (575) 397-1471

CERTIFIED MAIL

RETURN RECEIPT NO. 7007 2560 0000 4569 8654

July 2, 2012

Mr. Edward Hansen  
New Mexico Energy, Minerals, & Natural Resources  
Oil Conservation Division, Environmental Bureau  
1220 S. St. Francis Drive  
Santa Fe, New Mexico 87505

RE: Termination Request  
Vacuum K-26 EOL (1R425-98): UL/K, Sec. 26, T17S, R35E  
RICE Operating Company – Vacuum SWD System

Mr. Hansen:

Rice Operating Company (ROC) is the service provider (agent) for the abandoned Vacuum Saltwater Disposal (SWD) System and has no ownership of any portion of the pipeline, well, or facility. The System is owned by a consortium of oil producers, System Parties, who provide all operating capital on a percentage ownership/usage basis.

## **Background**

In 2010, ROC initiated work on the former K-26 EOL junction box as part of the system abandonment. The site is located in UL/K, Sec. 26, T17S, R35E. NM OSE records indicate that groundwater would likely be encountered at a depth of approximately 50 +/- feet. The site was delineated using a backhoe to collect soil samples at regular intervals, creating a 7x3x5-ft deep excavation. Each sample was field titrated for chlorides and field screened using a PID for hydrocarbons, resulting in low concentrations of each. The 5-ft sample was sent to a commercial laboratory for analysis of chloride and TPH, resulting in a chloride concentration of <16 mg/kg, and concentrations of gasoline range organics (GRO) and diesel range organics (DRO) below detectable limits. The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 5/11/2010, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate. The junction box final report, photo documentation, laboratory analysis, and PID sheet are attached.

2012 JUL -3 A 11:55  
RECEIVED OGD

**Recommendations**

Site investigation demonstrates that residual chloride and hydrocarbons in the vadose zone will not with reasonable probability contaminate groundwater in excess of NMOCD standards. This site meets the requirements of the NMOCD-approved Revised Junction Box Upgrade Work Plan (July 16, 2003). As such, ROC request termination of the regulatory file, or similar closure status.

Please contact me at (575)393-9174 if you have any questions or wish to discuss this site. Thank you for your time and consideration.

Sincerely,  
RICE Operating Company

A handwritten signature in black ink, appearing to read "H. Conder", with a long horizontal flourish extending to the right.

Hack Conder  
Environmental Manager

enclosures

RICE OPERATING COMPANY  
JUNCTION BOX FINAL REPORT

BOX LOCATION

SWD SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE	COUNTY	BOX DIMENSIONS - FEET		
							Length	Width	Depth
Vacuum	K-26 EOL	K	26	17S	35E	Lea	Eliminated		

LAND TYPE BLM \_\_\_ STATE X FEE LANDOWNER \_\_\_\_\_ OTHER \_\_\_\_\_

Depth to Groundwater 50 feet NMOCD SITE ASSESSMENT RANKING SCORE: 20

Date Started 4/22/2010 Date Completed 4/22/2010 OCD Witness no

Soil Excavated 3.9 cubic yards Excavation Length 7 Width 3 Depth 5 feet

Soil Disposed 0 cubic yards Offsite Facility n/a Location n/a

FINAL ANALYTICAL RESULTS: Sample Date 4/22/2010 Sample Depth 5 ft

TPH and Chloride laboratory test results completed by using an approved lab and testing procedures pursuant to NMOCD guidelines.

CHLORIDE FIELD TESTS

Sample Location	PID (field) ppm	GRO mg/kg	DRO mg/kg	Chloride mg/kg
SOURCE 5' GRAB	0.4	<10.0	<10.0	<16

LOCATION	DEPTH	mg/kg
background	6"	59
vertical delineation trench at the junction (source)	1'	117
	2'	83
	3'	91
	4'	83
	5'	56

General Description of Remedial Action: This junction box was addressed during the Vacuum SWD System abandonment. After the former junction box was removed an investigation was conducted using a backhoe to collect soil sample at regular intervals creating a 7x3x5-ft deep excavation. Each sample was field tested for chlorides and organic vapors which yielded low concentrations similar to that of the background sample.

The deepest sample, 5 ft BGS, was sent to a commercial laboratory for analysis of chloride and TPH which confirmed low concentrations

The excavated soil was returned to the excavation to ground surface and contoured to the surrounding area. On 5/11/2010, the site was seeded with a blend of native vegetation and is expected to return to a productive capacity at a normal rate.

enclosures, photos, lab results, PID (field) screenings, chloride curve

I HEREBY CERTIFY THAT THE INFORMATION ABOVE IS TRUE AND COMPLETE TO THE BEST OF MY KNOWLEDGE AND BELIEF.

REPORT ASSEMBLED BY Katie Jones INITIAL KJ COMPANY RICE OPERATING COMPANY  
PROJECT LEADER Larry Bruce Baker Jr. SIGNATURE Larry Bruce Baker Jr. DATE 3-17-11

# Vacuum K-26 EOL

Unit K, Section 26, T17S, R35E



Delineation trench being excavated

4/22/2010



Sample being Collected

4/22/2010



Excavation being seeded

5/11/2010



Excavation complete

5/11/2010



**ARDINAL**  
LABORATORIES

PHONE (575) 393-2326 • 101 E. MARLAND • HOBBS, NM 88240

ANALYTICAL RESULTS FOR  
RICE OPERATING COMPANY  
ATTN: BRUCE BAKER  
112 W TAYLOR  
HOBBS, NM 88240

Receiving Date: 04/22/10  
Reporting Date: 04/26/10  
Project Number: NOT GIVEN  
Project Name: VAC K-26 EOL  
Project Location: VAC. K-26 EOL

Sampling Date: 04/22/10  
Sample Type: SOIL  
Sample Condition: COOL & INTACT  
Sample Received By: JH  
Analyzed By: AB/HM

	GRO	DRO	
	(C <sub>6</sub> -C <sub>10</sub> )	(>C <sub>10</sub> -C <sub>28</sub> )	Cl*
LAB NUMBER	(mg/kg)	(mg/kg)	(mg/kg)

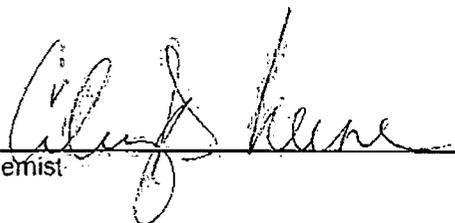
ANALYSIS DATE	04/25/10	04/25/10	04/23/10
H19732-1** SOURCE GRAB @ 5FT	<10.0	<10.0	< 16
<b>COPY</b>			
Quality Control	565	590	490
True Value QC	500	500	500
% Recovery	113	118	98.0
Relative Percent Difference	1.8	2.3	2.0

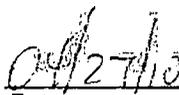
METHODS: TPH GRO & DRO. EPA SW-846 8015 M; Cl: Std. Methods 4500-ClB

\*Analysis performed on a 1:4 w:v aqueous extract.

Reported on wet weight.

\*\*One or more TPH surrogates outside historical limits due to matrix interference.

  
\_\_\_\_\_  
Chemist

  
\_\_\_\_\_  
Date

H19732 TCL RICE

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# RICE OPERATING COMPANY

122 West Taylor Hobbs, NM 88240

PHONE: (575) 393-9174 FAX: (575) 393-1471

PID METER CALIBRATION & FIELD REPORT FORM

Check Model Number:

X

Model: PGM 7300  
Model: PGM 7300  
Model: PGM 7300

Serial No: 590-000183  
Serial No: 590-000508  
Serial No: 590-000504


Model: PGM 7600  
Model: PGM 7600  
Model: PGM 7600

Serial No: 110-023920  
Serial No: 110-013744  
Serial No: 110-013676

GAS COMPOSITION: ISOBUTYLENE 100PPM / AIR: BALANCE

LOT NO: 927041	EXPIRATION DATE: 11-16-2012
FILL DATE: 11-13-09	METER READING ACCURACY: 99.9 ppm

ACCURACY: +/- 2%

SYSTEM	JUNCTION	UNIT	SECTION	TOWNSHIP	RANGE
Vacuum	K-26 EOL	K	26	17S	35E

SAMPLE ID	PID	SAMPLE ID	PID
Background	2.3	Source @ 1'	1.6
		2'	1.3
		3'	1.3
		4'	1
		5'	0.4

COPY

I verify that I have calibrated the above instrument in accordance to the manufacture operation manual.

SIGNATURE:



DATE: 4-22-10